

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MODIFICATION OF SERVICE PERFORMANCE
MEASUREMENT PLAN

Docket No. PI2022-3

**UNITED STATES POSTAL SERVICE NOTICE OF FILING
CHANGES TO SERVICE PERFORMANCE MEASUREMENT PLAN DOCUMENT**
(April 22, 2022)

Pursuant to 39 C.F.R. § 3055.5, the United States Postal Service (Postal Service) hereby notifies the Postal Regulatory Commission (Commission) of changes to the Postal Service's Service Performance Measurement (SPM) Plan document. The Postal Service's SPM Plan summarizes the current state of the Postal Service's SPM system. The Postal Service intends for its internal SPM systems to be accurate, reliable, and representative. In addition, the SPM Plan and resulting SPM data are expected to provide the Commission with the ability to perform its responsibilities with a high degree of confidence and to reasonably inform the public regarding the quality of service provided to market-dominant products.

The three principal changes to the SPM Plan, discussed further below, are as follows: 1) a revision to how the long haul exception impacts "Start-the-Clock" events; 2) the inclusion of Reply Mail in the measurement of Single-Piece First-Class Letters/Cards/Flats; and 3) a revision to the critical entry time (CET) applicable to Periodicals. These changes and other minor revisions, including word choice and grammar, are identified in the revised version of the SPM Plan (in both "clean" (blackline) and redline formats) included in Postal Service Library Reference USPS LR-PI2022-3-1, which is being filed in conjunction with this Notice.

I. INTRODUCTION

The Postal Service is required to establish modern service standards for its market-dominant mail products and to design these standards to provide a system of objective performance measurements for each market-dominant product as a basis for measurement of Postal Service performance. Section 3691 of Title 39, U.S. Code directs the Postal Service, in consultation with the Commission, to provide “a system of objective external performance measurements for each market-dominant product as a basis for measurement of Postal Service performance.”¹ Commission regulations further direct the Postal Service to “file notice with the Commission describing all changes to measurement systems, service standards, service goals or reporting methodologies, including the use of proxies for reporting service performance, 30 days prior to planned implementation.”²

II. CHANGES TO THE SPM PLAN

In Order No. 5989, the Commission favorably reviewed the Postal Service’s changes to the Postal Service’s current SPM Plan.³ In this order, the Commission also recommended that the Postal Service review the Public Representative’s comments.⁴ The Postal Service, in turn, has revised its SPM Plan to account for and address comments and recommendations from both the Commission and the Public Representative. There are three material changes to the SPM Plan:

- First, the Postal Service will be undertaking to measure Reply Mail. Currently,

¹ 39 U.S.C. § 3691(b)(1)(D).

² 39 C.F.R. § 3055.5.

³ See Order No. 5989, Order Approving Modifications to Market Dominant Service Performance Measurement Systems and Closing Docket, Docket No. PI2021-3 (Sep. 28, 2021).

⁴ Id. at 8.

the Postal Service does not include Reply Mail in service performance measurement.⁵ Through internal measurement enhancement initiatives, the Postal Service has developed the ability to track Reply Mail. The Postal Service can now leverage this ability to include Reply Mail in measurement as part of Single Piece First Class mail.

- The second change relates to the long haul exclusion to service performance measurement. Currently, a high percentage of Presort First-Class Mail is excluded from service measurement due to a long haul exclusion, a type of mail acceptance exclusion. The reason for this exclusion is that when the Postal Service transports mail from a mailer facility to a Postal Service facility that is not in the same District, the Postal Service is unable to accurately determine the date and time of when the Postal Service takes possession of mail. To improve the Postal Service's measurement capabilities in this area, the Postal Service will implement a scanning solution at impacted mailer locations to capture when Postal Service trailers, and nested containers, depart from that mailer facility. Accordingly, the Postal Service is updating its service performance measurement business rules to leverage the date and time of the departure event from the mailer facility and will utilize this to enhance the "Start-the-Clock" event for a plant load mailing using postal transportation.

⁵ Pursuant to 39 CFR part 3055.3, the Commission granted the Postal Service's request to exempt Business Reply Mail from annual and periodic reporting requirements for service performance achievements under the semi-permanent business exception in 2010. See Order No. 531, Order Concerning Postal Service Request for Semi-Permanent Exceptions from Periodic Reporting of Service Performance Measurement, Docket No. RM2010-11 (Sep. 3, 2010).

- The third change involves the critical entry time (CET) applicable to Periodicals. Periodical mailings currently have as many as five different CETs, depending on the nature of the mailing and the facility. Having so many different CETs is overly complicated and results in both inefficient mail processing operations and inconsistent, unreliable service. The implementation of a more uniform CET applicable to all Periodicals and facilities will promote simplification of mail processing operations, and hence more efficient allocation and use of processing and sorting equipment. The Postal Service anticipates that this initiative will improve service performance for Periodicals.

The above changes and other minor revisions, including word choice and grammar, are identified in the revised version of the internal SPM Plan (in both “clean” (blackline) a redline formats) included in Postal Service Library Reference USPS LR-PI2022-3-1, which is being filed in conjunction with this Notice. The revised SPM Plan effectuates the Commission’s recommendation in Order No. 5989 for the Postal Service to, among other things, review certain figures in the Postal Service’s SPM Plan, “and determine if and how it could amend said figures to provide more clarity.”⁶ The Postal Service respectfully submits that the changes reflected in the revised SPM Plan accomplish just that.

III. CONCLUSION

The Postal Service’s changes to its SPM Plan are intended to provide clarification and update the language of the document. The Postal Service expects that

⁶ See Order Approving Modifications to Market Dominant Service Performance Measurement Systems, Docket No. PI2021-3 (Sep. 28, 2021) at 7.

these changes will produce accurate, reliable, and more representative measurement of service performance.

Respectfully submitted,

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